

February 27, 2012

Marlene H. Dortch, Esq.  
Secretary  
Federal Communications Commission  
445 12th Street, S.W.  
Washington, D.C. 20554

Re: IB Docket No. 11-109; NTIA Letter Regarding LightSquared Conditional Waiver

The Vehicle Infrastructure Integration Consortium (VIIC) is a consortium of nine automakers including BMW, Chrysler, Ford, General Motors, Honda, Nissan, Mercedes-Benz, Toyota, and Volkswagen. Together VIIC members account for over 90% of light-duty car and truck sales in the U.S. On June 11, 2011 the VIIC wrote an Ex Parte Letter to you regarding LightSquared Subsidiary LLC Application for Modification of Authority for Ancillary Terrestrial Component, File No. SAT-MOD-20101118-00239. A copy of the Letter is attached for easy reference.

In that earlier letter, the VIIC described its work with USDOT on the vehicle-to-vehicle (V2V) and vehicle-to-infrastructure (V2I) cooperative communications systems and how it will offer transformational opportunities for vehicle safety, and how it will assist in achieving mobility and environmental objectives. The continuing work toward the realization of these societal benefits relies heavily on GPS as a critical enabling technology. Later this summer, a significant field trial of V2V/V2I technology will take place under USDOT sponsorship in support of a 2013 regulatory decision to possibly mandate such technologies on all new motor vehicles.

The VIIC fully supports the recent conclusions of the February 14, 2012, NTIA letter regarding the likelihood of GPS interference if the LightSquared land-based system were to become operational. VIIC therefore supports the Commission's recent Public Notice to vacate the Conditional Waiver Order and recommends the Commission to take final action to vacate the Order granted to LightSquared on January 26, 2011.

If you have questions on this recommendation, please contact me by phone at (248) 396-7696 or email at [vwilber@viiconsortium.org](mailto:vwilber@viiconsortium.org).

Best Regards,

Vann H. Wilber  
Project Manager  
[vwilber@viiconsortium.org](mailto:vwilber@viiconsortium.org)  
(248) 396-7696

June 11, 2011

Marlene H. Dortch, Esq.  
Secretary  
Federal Communications Commission  
445 12th Street, S.W.  
Washington, D.C. 20554

Re: Ex Parte Letter of the Vehicle Infrastructure Integration Consortium; LightSquared Subsidiary LLC  
Application for Modification of Authority for Ancillary Terrestrial Component, File No. SAT-MOD-  
20101118-00239

Dear Ms. Dortch:

The Vehicle Infrastructure Integration Consortium (VIIC) is submitting the following comments on issues raised regarding interference to global positioning system (GPS) devices in the Commission's grant of the above-referenced LightSquared modification application.

VIIC is a consortium of nine automakers including BMW Group, Chrysler LLC, Ford Motor Company, General Motors, Honda, Nissan, Mercedes-Benz, Toyota, and Volkswagen who have been working on policy research and development activities with the U.S. Department of Transportation (and other stakeholders) associated with deployment of 5.9 GHz Dedicated Short Range Communication (DSRC) cooperative safety systems. DSRC systems are envisioned to be a significant part of the connected vehicle intelligent transportation system initiative in the U.S. The vehicle-to-vehicle (V2V) and vehicle-to-infrastructure (V2I) cooperative communications provided by these systems will support important vehicle safety, as well as mobility and environmental objectives.

A GPS device is a critical element of each DSRC crash avoidance system anticipated to be incorporated in millions of motor vehicles. Accurate and uninterrupted GPS performance is an essential element for connected vehicle DSRC crash avoidance safety communications in applications that can warn the driver of impending crash conditions. Driver warnings can reduce the occurrence of such things as intersection and lane change collisions, among other scenarios.

Cooperative crash avoidance safety performance relies heavily on vehicle location/position information provided by the vehicle's GPS. The basic message for V2V safety communication is the Basic Safety Message (BSM). The BSM is used to support many DSRC applications by providing a number of vehicle parameters, including location/position from the vehicle's GPS. For DSRC safety applications to work properly, the information communicated between vehicles, especially the vehicle location/position provided by the GPS, must be accurate. Accordingly, the VIIC and its members are

interested in ensuring that any interference that may be caused by LightSquared's Ancillary Terrestrial Component (ATC) operations into GPS devices is managed to acceptable levels. The VIIC shares the concerns expressed by the Commission regarding such interference.

The VIIC supports the condition requiring LightSquared to establish an industry working group to develop a solution for resolving interference concerns. We encourage the Commission to monitor closely the progress of this group and ensure that real solutions to the GPS interference issue emerge. The Commission can facilitate the achievement of this goal by making sure that the process undertaken by the working group is transparent and permits broad representation by interested stakeholders.

In addition to finding a viable solution to the GPS interference issue, the process developed by the industry working group should establish criteria that can be used for other cases to determine whether interference concerns are resolved in any particular case. As GPS technologies and services continue to evolve, it is necessary to ensure that GPS interference concerns can be resolved quickly and efficiently with no service disruption.

If you have questions on these comments, please contact Vann Wilber by phone at (248) 773- 8302 or email at [vwilber@viiconsortium.org](mailto:vwilber@viiconsortium.org).

Sincerely,

Tom Schaffnit  
President, VIIC